

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

Martinsburg Division

UNITED STATES OF AMERICA

v.

TIMOTHY JOHN WATSON,

Defendant.

Case No. 3:20mj127

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Mark McNeal, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a Criminal Complaint alleging that the defendant, Timothy John Watson, violated 18 U.S.C. § 371, 18 U.S.C. § 922(o), and 26 U.S.C. § 5861(a).

2. Title 18, United States Code, Section 371 prohibits two or more persons from conspiring to commit any offense against the United States.

3. Title 18, United States Code, Section 922(o) prohibits the knowing possession of a machinegun.

4. Title 26, United States Code, Section 5861(a) prohibits a person from engaging in business as a manufacturer or importer of, or dealer in, firearms without having paid the special occupational tax or having registered, as required by Federal law.

5. Title 18, United States Code, Section 921(a)(23) incorporates the definition in 26 U.S.C. § 5845(b) of a machinegun as “any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger.” According to § 5845(b), the term “machinegun” also includes “the frame

or receiver of any such weapon, any part designed and intended solely and exclusively, or combination parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.”

6. The Bureau of Alcohol, Tobacco, and Firearms (“ATF”) has examined an auto sear known by various trade names including “AR15 Auto Sear,” “Drop In Auto Sear,” and “Auto Sear II,” which consists of a sear mounting body, sear, return spring, and pivot pin. The ATF has found that the single addition of this auto sear to certain AR15 type semiautomatic rifles, manufactured with M16 internal components already installed, will convert such rifles to machineguns. Thus, the auto sear is a combination of parts designed for use in converting a weapon to shoot automatically more than one shot, without manual loading, by a single function of the trigger. Consequently, the auto sear is a machinegun as defined by 26 U.S.C. § 5845(b). See 27 C.F.R. § 179.11.

7. I have been employed as a Special Agent of the Federal Bureau of Investigation (“FBI”) since May 2015, and I am currently assigned to Martinsburg, West Virginia Resident Agency of the Pittsburgh Division. I attended the FBI’s training academy in Quantico, Virginia, where I received instruction regarding a variety of investigations. I graduated from the FBI training academy as a Special Agent in November 2015. I serve as the Assistant Coordinator for Weapons of Mass Destruction threats within the Eastern Panhandle of West Virginia. During my time as an FBI Special Agent, I have worked a variety of investigations, including investigations of counterterrorism, domestic terrorism, white-collar crimes, crimes against children and violent gang offenses.

8. The facts in this affidavit come from my personal investigation and observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show simply that there is sufficient probable cause for this Criminal Complaint and the requested arrest warrant and does not set forth all of my knowledge about this matter. I have set forth only the facts I believe are necessary to establish probable cause that Timothy John Watson has violated 18 U.S.C. § 371, 18 U.S.C. § 922(o), and 26 U.S.C. § 5861(a).

PROBABLE CAUSE

9. As detailed below, the FBI's investigation, assisted by the ATF and the U.S. Postal Inspection Service, has revealed that Timothy John WATSON, hereinafter "WATSON," a resident of Ranson, West Virginia, is the registrant of the website named "portablewallhanger.com." Since at least in or about March 2020, the online retailer, "portablewallhanger.com," purports to sell 3D printed innocuous hooks, made with two pieces, however, when disassembled, one of the pieces functions as an illegal drop in auto sear which has been confirmed by ATF to convert a semi-automatic AR-15 into a fully-automatic machine gun. WATSON operates the business from the his residence located at 302 South Marshall Street, Apartment 2, Ranson, West Virginia 25438, hereinafter "WATSON's residence."

Boogaloo Movement's Association with Portable Wall Hanger

10. Multiple items of evidence associate the business of Portable Wall Hanger with the Boogaloo movement, a loosely organized far-right, anti-government, and extremist political movement in the United States. Boogaloo adherents say they are preparing for, or seek to incite,

a second American Civil War, which they call the Boogaloo.¹ The movement consists of pro-gun, anti-government groups. The specific ideology of each group varies and views on topics such as race differ widely. The Boogaloo movement primarily organizes online and participants have appeared at in-person events including the 2020 United States anti-lockdown protests and the George Floyd protests. Heavily armed, Boogaloo members are often identified by their attire of Hawaiian shirts and military fatigues. Since 2019, at least 12 people affiliated with the Boogaloo movement have been charged with crimes, including the killing of a Federal courthouse security guard in May 2020, the killing of a California law enforcement officer in June 2020 and various crimes related to the George Floyd protests.

- a. In May 2020, Steven CARRILLO, hereinafter “CARRILLO,” a self-described Boogaloo adherent shot two Protective Security Officers at the Ronald V. Dellums Federal Building and United States Courthouse located in Oakland, California. One

¹ “Boogaloo” is a term referencing a violent uprising or impending civil war. The term is sometimes used by militia extremists and racially or ethnically motivated violent extremists (RMVE), who allude to it using shorthand such as “big igloo” or “big luau” and imagery such as igloos or Hawaiian shirts. The term has particularly resonated with militia extremists, who have adopted it to reference an impending politically-motivated civil war or uprising against the government following perceived incursions on Constitutional rights—including the Second Amendment—or other perceived government overreach. Some RMVEs have used the term to reference an impending race war—or other conflict that will lead to the collapse of the “system,” including the US government, society, etc. The Boogaloo is not a single cohesive group, but rather a loose concept arising from internet platforms which has become a rallying point for some extremists.

of the security officers died of his gunshot wounds; the other sustained serious injuries that required surgery.

- b. In June 2020, CARRILLO, shot members of the Santa Cruz County Sheriff's Office near his (CARRILLO's) residence located at 120 Waldeberg Rd., Ben Lomond, CA 95005. One deputy subsequently died from his injuries.

11. The first item of evidence associating the business of Portable Wall Hanger with the Boogaloo movement can be found on the "Updates" webpage on portablewallhanger.com. That page includes a March 18, 2020 advertisement that "10% of all Portable Wall Hanger proceeds for March 2020 will be: donated directly to the **Justice for Duncan Lemp**² GoFundMe fundraiser." (emphasis in original). The investigation has revealed that on at least three different dates (on or about March 18, 2020, on or about April 13, 2020, and on or about April 20, 2020), "Portable Wall Hanger" made a donation to the Justice for Duncan Lemp GoFundMe fundraiser in the amount of \$100 per donation (at least \$300 total). Content from the e-mail address "portablewallhanger@mail.com," which has been attributed to WATSON, shows the donation receipts sent via e-mail from support@gofundme.com for the aforementioned donations.

12. The second item of evidence associating the business of Portable Wall Hanger with the Boogaloo movement came from the proffer of a cooperating defendant under indictment in the U.S. District of Minnesota (the "cooperating defendant"), described in detail below. Specifically,

² By way of background, on March 12, 2020, Duncan Lemp was fatally shot at his home in Potomac, Maryland during a no-knock warrant execution. The warrant had been issued following an investigation that revealed Lemp was in possession of regulated firearms. Police have said that Lemp was shot after confronting an officer during the execution of the warrant. Three assault rifles and two handguns were recovered from the residence. Lemp has since been described as a "martyr" for the Boogaloo movement, some adherents to which believe Lemp was murdered by police because of his involvement with the movement and his anti-government beliefs.

the cooperating defendant, a self-professed adherent of the Boogaloo movement, told the FBI that he had learned about portablewallhanger.com from advertising on Facebook Boogaloo groups.

13. Several other items of evidence are outlined below in the sections discussing the search warrant returns for e-mail and Instagram accounts associated with portablewallhanger.com.

Watson Establishes the Online Business of Portable Wall Hanger

14. In January 2020, the e-mail and Instagram accounts were created that would subsequently be made accessible at the bottom of each page of the website portablewallhanger.com.

- a. On January 2, 2020, the e-mail account portablewallhanger@mail.com was created in the name of “Wall Hanger.”
- b. On January 16, 2020, the Instagram account with the username @Portable_Wall_Hanger was registered in the name of “Portable Wall Hanger” with a registered e-mail address of portablewallhanger@mail.com.

15. In January 2020 and March 2020, PayPal accounts were created that would subsequently be used to receive payments for products sold on portablewallhanger.com.

- a. On January 2, 2020, PayPal account 1356804870709659874 in the name of Wall Hanger, business name Portable Wall Hanger, was created with Watson’s residence as the associated address and portablewallhanger@mail.com as associated email address. This account included an associated work telephone number of (240) 675-6070, which open source records associate with Timothy John Watson and Watson’s residence. Review of transaction records provided by PayPal Global investigations revealed in excess of 100 transactions during the period of January 8, 2020, through March 19, 2020. The subject of these transactions reflected

purchases of the following items: Portable Wall Hanger - Single; Portable Wall Hanger – Family Size; or Replacement Hanger Hook.

- b. On March 20, 2020, PayPal account 1904111253734225865 in the name of Timothy Watson, date of birth January 13, 1990, business name Portable Wall Hanger, was created with Watson's residence as the associated address and sales.portablewallhanger@mail.com and portablewallhanger@protonmail.com as the associated e-mail addresses. This account included an associated work telephone number of (240) 675-6070. Review of transaction records provided by PayPal Global investigations revealed in excess of 500 transactions during the period of March 21, 2020, through October 2, 2020. The subject of these transactions reflected purchases of the following items: Black Coat Hanger Pack; Grey Coat Hanger Pack; Red Coat Hanger Packs; Portable Mask Hanger; Portable Wall Hanger – Single; Portable Wall Hanger – Single Pack; Replacement Hanger Hook; or Replacement Hanger Hook – Red Coat Hanger.

16. On February 28, 2020, the portablewallhanger@mail.com account received an e-mail from the West Virginia State Treasurer's Office related to the fee associated with the new business registration completed online through the West Virginia Secretary of State's One Stop Business Portal. The receipt lists the company name as "Portable Wall Hanger," the name as "Timothy Watson," the associated address as WATSON's residence, the associated phone number as (240) 670-6070 (one digit off from the (240) 675-6070 number), the associated e-mail address as portablewallhanger@mail.com, and the name of the holder of the Visa card used for the payment as "Timothy Watson."

17. On March 26, 2020, an account with Stamps.com, an American company that

provides Internet-based mailing and shipping services, was opened in the name of Timothy Watson. The account lists WATSON's residence as the billing address and physical address. The account also includes the company name of Portable Wall Hanger, the e-mail address of portablewallhanger@protonmail.com, and the telephone number (240) 675-6070. According to Stamps.com records, approximately 362 shipments have been made using the account between April 30, 2020, and August 25, 2020 to addresses in approximately 46 states, using WATSON's residence as the return address.

18. In or about March 2020, a website named portablewallhanger.com was registered through Weebly, Inc., a web hosting service headquartered in San Francisco, California. According to Web.com, a company headquartered in Jacksonville, Florida that provides domain registration and web development services, the website registration details include a name, an address, a telephone number, and e-mail addresses for registration, administration, and technical purposes. "Tim Watson" is the name provided on Web.com's website registration for registration, administration, and technical purposes. The address for all three purposes is WATSON's residence. The phone number for all three "purposes" is (240) 675-6070. The e-mail address for registration and technical purposes is portablewallhanger@protonmail.com. The e-mail address for administration purposes is portablewallhanger@mail.com. According to e-mail messages obtained via a search warrant issued for this latter e-mail account, Watson had operated a predecessor website portablewallhanger.simplesite.com since in or about January 2020 but that business was subsequently moved to portablewallhanger.com in or about March 2020.

19. According to e-mail correspondence found in the portablewallhanger@mail.com account, Portable Wall Hanger opened an e-mail account called portablewallhanger@protonmail.com as part of the migration to portablewallhanger.com.

ProtonMail is an end-to-end encrypted e-mail service founded in 2013 in Geneva, Switzerland. ProtonMail is not obliged to store specific data of their customers, but must, at the request of Swiss authorities, release the data they have at their disposal. It is well known and part of ProtonMail's business model that not much data is stored but could include data such as registration date and time, date and time of last activity, if available IP address used, recovery e-mail address, and payment information associated with the account. As indicated below, this e-mail account was subsequently listed on portablewallhanger.com with the message: "We take your privacy seriously, please feel free to reach out to us at portablewallhanger@protonmail.com with any questions."

20. Based on training and experience, your Affiant knows that nefarious actors involved in criminal activity oftentimes use end-to-end encryption communication methods, to include platforms such as ProtonMail, in order to protect privacy and to remain anonymous to avoid any type of law enforcement detection.

FBI San Francisco Subject with Connection to Portable Wall Hanger

21. PayPal transaction logs for account 1356804870709659874 includes one purchase made by a customer who provided the name "Steven Carrillo" as the purchaser's name, an e-mail address of steven carrillonr@gmail.com, and a Winters, CA shipping address. PayPal account 1356804870709659874 records indicate that this individual purchased a "Portable Wall Hanger – Single" between on or about January 10, 2020 and or about January 13, 2020. The portablewallhanger@mail.com account contains an e-mail dated January 10, 2020, which informed Portable Wall Hanger that "Steven Carrillo" had placed an order for a "Portable Wall Hanger – Single." The e-mail lists 120 Waldeberg Rd., Ben Lomond, California 95005, as the billing address of the purchaser. As stated above, 120 Waldeberg Rd., Ben Lomond, California 95005 is near where CARRILLO shot members of the Santa Cruz County Sheriff's Office in June

2020. The billing information also lists an e-mail address of steven carrillousaf@gmail.com. CARRILLO, who carried out the shootings in May and June 2020, was a member of the U.S. Air Force, also known as “USAF,” as is included in the e-mail address.

FBI-Minneapolis Subject Purchases Auto Sears from Portable Wall Hanger and Provides Post-Arrest Proffer

22. In a post-arrest proffer of an FBI-Minneapolis investigation subject (hereafter the “subject” and, later, the “cooperating defendant”), the subject stated that he ordered four 3D printed drop in auto sears from portablewallhanger.com using money provided to him by an undercover agent, whom he believed was a high-level member of a designated foreign terrorist organization for the purpose of converting a semi-automatic rifles to a fully automatic rifle. The subject completed the purchase on the portablewallhaner.com website using PayPal. PayPal records for the Paypal account 1904111253734225865 show a purchase made on or about August 24, 2020 by the subject to be shipped to a “Mike Smith at 720 Mccallum Drive, New Brighton, MN 55112.”

23. Account records for the aforementioned Stamps.com associated with WATSON show a generated postage label on or about August 25, 2020 for a “Mike Smith at 720 Mccallum Drive, St. Paul, MN 55112”. Also, according to the record, the return address associated with the postage label was WATSON’s residence.

24. On or about August 28, 2020, the subject sent an e-mail to portablewallhanger@protonmail.com. The subject stated that he had placed his order on August 24 and “just wanted to make sure it shipped and wondering if there’s an ETA for arrival.”

25. On or about August 28, 2020, the subject received a reply e-mail from

portablewallhanger@protonmail.com. The sender informed the subject that his order had shipped on August 25 and indicated that his tracking number e-mail may have gone to spam. The sender concluded the e-mail with "Best Regards, T. @ Portable Wall Hanger."

26. On August 29, 2020, after receiving his shipment, the subject sent an e-mail to portablewallhanger@protonmail.com, stating in whole:

Hey so I'm trying to install these key hooks on my wall and I'm having a lot of difficulties... I took off a small square tab on the side and that helped, but I can't seem to get this to sit right on my wall. Do I need to make any more modifications to install this on my wall?

27. On or about August 29, 2020, the subject received a reply e-mail from portablewallhanger@protonmail.com, stating in whole:

We're glad to hear your order arrived and we're sorry to hear that you're having trouble mounting your new Portable Wall Hanger products.

There is never any reason to modify the geometry of your Portable Wall Hanger products.

Both Coat Hanger Packs and Portable Mask Hangers come pre assembled and ready to mount on your wall (using the provided mounting screws), or on your vehicle AC vent (depending on which product you got.)

*If you think you may have received a factory defective item, we will certainly get you some replacements shipped out Monday!
Just let us know if we should ship to the same address as your initial order.*

*Best Regards,
T. @ Portable Wall Hanger*

28. On or about August 29, 2020, the subject sent an e-mail to portablewallhanger@protonmail.com, stating in whole:

No matter what I've tried I cannot get my key hook to mount correctly, it keeps blocking my door from opening when I pull it open.

29. On or about August 29, 2020, the subject received a reply e-mail from portablewallhanger@protonmail.com, stating in whole:

In this case it sounds like you may want to consider mounting your Portable Wall Hanger products farther away from your door. We will send out another duplicate order for you free of charge. If you did in fact receive a factory defective order we want to be sure you're happy with your purchase! If it turns out that mounting your Portable Wall Hanger products in a different location in your house solves the issue, you'll have some extra Portable Wall Hanger goodies to gift to some friends. We will personally send you your tracking # as soon as your order ships out so it doesn't [sic] get lost in the dot come sauce again. Thank you for your business and patience, we really apologize for the inconvenience.

*Best regards,
T @ Portable Wall Hanger*

30. On or about August 29, 2020, the subject sent an e-mail to portablewallhanger@protonmail.com, stating in whole:

And could I get them overnighted? It's time sensitive and I really need to get these keys hung, I'll pay for the extra shipping.

31. On or about August 29, 2020, the subject received a reply e-mail from portablewallhanger@protonmail.com, stating in whole:

At this time we only utilize USPS so the earliest we can ship out when they open up (Monday morning). Rest assured your replacement order is at the top of the list though friend. We will give you a shout as soon as your order ships Monday morn.

*Best Regards,
T. @ Portable Wall Hanger*

32. Based on training and experience, your Affiant believes that the above conversation uses “code” language when discussing Portable Wall Hanger products. Your Affiant believes that the above references to “install these key hooks,” refers to mounting the drop in auto sear into an AR-15. Your Affiant believes the above reference to “cannot get my key hook to mount correctly, it keeps blocking my door,” refers to the buyer being unable to mount the drop in auto sear into an

AR-15 correctly. Your Affiant believes the above reference to “need to get these keys hung,” refers to having the capability to fire multiple rounds from a fully automatic weapon.

33. On or about August 29, 2020, the subject met in person with a group of individuals, including the undercover agent, whom he believed to be a high-level member of a designated foreign terrorist organization, who had requested that the subject purchase auto sear devices. The meeting was audio recorded. According to the audio recording, the subject made the following statements, among others, referring to the Portable Wall Hanger products he had ordered on August 24:

So these are the pieces that we were talking about so you take out this allen screw because technically they are wall hangers. So you screw it into the wall, but so you take out this allen screw. Take this piece out and then you mount it so you undo the AR and then you mount it behind the trigger group.

...

Yeah so I modified two of them so depending on the type of AR they need to be a little bit different so I modified two of them and then two of them are stock.

...

I've got them sending more too um so when I threw this in my rifle um it was jamming a little bit when I tried to pull the bolt carrier back so I told them that and their like hey it might've been a factory de- ya know defect like ya know sometimes the 3d printers are a little bit off so they are actually sending me another batch out on Monday.

...

Yeah they use a computer and then a 3D printer to make these.

34. On or about August 29, 2020, at the end of the meeting, the subject provided one of the auto sears he had purchased from Portable Wall Hanger to the undercover agent and kept the remaining three. Investigation has revealed that the subject, when troubleshoot e-mailing back and forth with portablewallhanger@protonmail.com, was meeting in person with individuals,

including an undercover agent, whom he believed to be a high-level member of a designated foreign terrorist organization. This shows that the subject was in fact using “code” language with portablewallhanger@protonmail.com, when talking about the Portable Wall Hanger products he had purchased.

35. Account records for a Paypal PostPay account associated with WATSON show a generated postage label on or about August 31, 2020 for a “Mike Smith at 720 Mccallum Drive, St. Paul, MN 55112”. Also, according to the record, the return address associated with the postage label was 302 S Marhall (sic) St 2 Ranson WV 25438. But for the apparent typographical error, this address matches the address of the WATSON’s residence.

36. On or about August 31, 2020, the subject received an e-mail from service@paypal.com stating “Your package from Portable Wall Hanger is on its way” and the e-mail provided a U.S. Postal Service tracking number. On or about September 1, 2020, the subject received an e-mail from portablewallhanger@protonmail.com, stating “Your replacement order shipped out yesterday.” The sender also included the USPS tracking number and concluded the e-mail “Best Regards, T. @ Portable Wall Hanger.”

37. On or about September 3, 2020, the FBI arrested the subject for violations of 18 U.S.C. § 2339B, which prohibits conspiring to provide or attempting to provide material support or resources to a designated foreign terrorist organization. On or about the same date, the FBI conducted a Mirandized custodial interview of the subject at an FBI-Minneapolis office located in Brooklyn Center, Minnesota. The interviewing agent showed the subject a photograph of one of the Portable Wall Hanger products and asked him to identify the object depicted. The subject said the item was a “key hanger.” The subject admitted that he had purchased the item at portablewallhanger.com in the last couple of weeks. The subject stated that the item was delivered

to his residence. At first, the subject denied any knowledge that the item could be used for any other purpose. The subject subsequently acknowledged that the item had other uses but stated that he had never modified a semiautomatic rifle to make it an automatic rifle. Shortly thereafter, the subject invoked his right to counsel and the interview was discontinued.

38. On or about September 8, 2020, having obtained from a U.S. Postal Inspector the second Portable Wall Hangers package sent to the subject, the FBI in Minneapolis searched the package pursuant to a search warrant issued in the United States District Court for the District of Minnesota on September 4, 2020. Inside the package, the FBI found four “Possible drop in Auto Sears.” The package had a return shipping address of Portable Wall Hangers 302 S Marhall (sic) St 2 Ranson WV 25438-1774. As previously stated, but for the apparent typographical error, this address matches the address of WATSON’s residence.

39. On or about September 11, 2020, the FBI in Minneapolis conducted an open source check of the website portablewallhangers.com and noted the following information, among other items:

- a. An area to provide an email to join a mailing list.
- b. Products for sale listed as: Portable Mask Hanger (low in stock), Grey Coat Hanger Pack, and the Red Coat Hanger. All \$14.99.
- c. 10% of all Portable Wall Hanger proceeds for March 2020 will be donated directly to the Justice for Duncan Lemp GoFund Me fundraiser.
- d. The website provides tracking numbers for shipments.
- e. The business is located in “Wild and Wonderful West Virginia.”
- f. The Red and Black portable wall hanger products share the same physical properties and are high impact and heat resistant PETG (open source research

suggests PETG could stand for polyethylene terephthalate glycol plastic used in 3D printing).

- g. The business uses the “latest FDM 3D Printing technology available to attain an extremely robust and resilient (sic) final product. Portable Wall Hangers are very tough.”
- h. Assurances to not share or sell any of a customer's information under any circumstance.
- i. All transactions through PayPal.
- j. An animation showing how the wall hangers work.
- k. A statement that the business does not care what name is used to place the order.
- l. An email contact address as portablewallhanger@protonmail.com.

40. In addition, the website hyperlinks to portablewallhanger@mail.com and an Instagram account with the username [@Portable_Wall_Hanger](#) on each page of the website.

41. On or about September 15, 2020, FBI agents interviewed the subject referenced above (hereinafter “cooperating defendant”) pursuant to a proffer letter at the U.S. Attorney’s Office in Minneapolis, Minnesota. The cooperating defendant provided the following information:

- a. The agents again showed the cooperating defendant a photograph of a Portable Wall Hanger product he had ordered. The cooperating defendant identified the item as a drop in auto sear that he ordered from portablewallhanger.com.
- b. The cooperating defendant stated that the auto sear is a 3D printed piece of plastic that is used to convert a semi-automatic rifle to a fully automatic rifle.
- c. When the cooperating defendant received the package of drop in auto sears from portablewallhanger.com, he used the contents in the package on his own ArmaLite

SPR rifle, which he assumed had since been seized by agents from his residence.

The cooperating defendant said he function tested the rifle but was not sure that the auto sear was working correctly because it was not cycling how a fully automatic weapon would cycle.

- d. The cooperating defendant said he had never previously purchased a 3D printed drop in auto sear from portablewallhanger.com but knew about the site from advertising on Facebook Boogaloo groups. The cooperating defendant said the website originally started as a “simple site” before becoming portablewallhanger.com in approximately March 2020. The advertising in Boogaloo groups done by other users showed the drop in auto sears as “wall hooks,” however, everyone in the Boogaloo groups knew that the pieces were in fact drop in auto sears based upon context clues in discussions about fully automatic weapons. The cooperating defendant said he believed the drop in auto sears were called “wall hooks” and sold as “wall hooks” because he assumed it was illegal to even possess the 3D printed drop in auto sears.
- e. The cooperating defendant stated that the 3D printed drop in auto sear from Portable Wall Hanger comes as two pieces: 1) a hook and 2) a bracket with screws or other materials to attach the bracket to the wall. According to the cooperating defendant, the hook is the part that is inserted into the rifle to convert it to fully automatic. The bracket is not inserted into the rifle. Rather, it is a fake or show piece to continue the façade that the set is a “wall hook.” The cooperating defendant said he knew what the wall hangers were for because there were often advertisement pictures on Facebook without the bracket.

42. On or about September 16, 2020, the ATF installed one of the Portable Wall Hanger products sent to the subject/cooperating defendant into a host ATF exemplar Colt AR-15 rifle. The fitting process was accomplished within approximately 15 minutes. The ATF then fired five rounds of ammunition from the firearm with the device installed. The firearm fired all five cartridges automatically with a single function of the trigger, thereby confirming the fact that the device from Portable Wall Hanger functioned as a drop in auto sear.

43. On or about October 5, 2020, the FBI in Minneapolis conducted a physical review of the subject's/cooperating defendant's iPhone and ProtonMail account pursuant to a search warrant issued in the United States District Court for the District of Minnesota on September 11, 2020. Pursuant to this search, the FBI located and took photographs of the e-mails quoted above.

**Comcast Records Reveal High-Speed Internet Connection at WATSON's Residence
Utilized to Connect to Portable Wall Hanger Accounts**

44. Comcast account records show that high-speed internet service is provided to the WATSON's residence and has been since July 2018. Comcast records show that this service is still active at WATSON's residence as of October 19, 2020. The subscriber named on the account is listed as Emily CROSS, hereafter "CROSS," the known girlfriend of WATSON. Comcast records also include an IP History log associated with the account. Specifically, this log includes the IP address 73.133.140.236, which was assigned (Lease Grant) to WATSON's residence account from at least April 22, 2020, through on or about October 19, 2020.

- a. Pen Register/Trap and Trace records for the Instagram account associated with Instagram user name Portable_Wall_Hanger show a login on or about October 9, 2020 from IP address 73.133.140.236, an IP address associated with the Comcast account subscribed to CROSS, WATSON's known girlfriend at WATSON's

residence address.

- b. PayPal account 1904111253734225865 Activity Log records associated with WATSON, Portable Wall Hanger, and e-mail addresses sales.portablewallhanger@mail.com and portablewallhanger@protonmail.com show a login on or about October 6, 2020 from IP address 73.133.140.236, an IP address associated with the Comcast account subscribed to CROSS, WATSON's known girlfriend at WATSON's residence address.

Records portablewallhanger@mail.com Account Include Communications Containing Veiled References to Boogaloo and Knowledge that "Hangers" are Drop In Auto Sear

45. On or about October 23, 2020, 1 & 1 IONOS Inc. produced records for portablewallhanger@mail.com (the "account") pursuant to a search warrant issued in the U.S. District Court for the Northern District of West Virginia on or about October 22, 2020.

46. The account contains e-mails with veiled references to Boogaloo.

- a. On or about February 26, 2020, a customer with an e-mail address containing the word "centermass" asked:

Do you guys keep records of the hangers you sell and information on the customers you sell them to? I'm worried about my paypal info being stolen or something bad happening to my dog, if your business is compromised.

Based on training and experience, your Affiant knows that the mention of a dog being harmed is a veiled reference to the aforementioned Duncan Lemp incident. The user of the account responded:

*All records are private information and are never sold or shared.
All payment transactions are handled through paypal so your billing address never goes in our system (unless it's synonymous with your shipping address, in which case it still would remain private)*

All Portable Wall Hanger products are just that, Portable Wall Hangers. Portable

Wall Hangers are designed specifically to provide a convenient location to hang your keys or other light weight items. Unless your dog is opposed to your keys being in one spot, or if your dog is hypoallergenic to PETG plastic, I don't see why you would have anything to worry about.

*Best Regards,
T. @ Portable Wall Hanger*

- b. On or about March 21, 2020, the user of the account sent an e-mail addressing a customer as “Sir Boogie” and ending the e-mail “Best Regards, T. @ Portable Wall Hanger.” The term “Boogie” is a reference to Boogaloo.
- c. The account contains an e-mail sent from the user of the account on or about April 18, 2020, to a customer to address an “unfortunate slanderous post” that Portable Wall Hanger was an FBI sting operation. The user of the account offered to cancel the customer’s order, but stated:

Please know this however, I am working really damn hard for you fine people. I mean like 12 hour shifts no breaks for sunday [sic] hard. I do it because I believe that you as freedom loving red blooded folks deserve a convenient and reliable solution to keep your keys, lanyards, jackets and light coats in a known location.

...

*Best Regards,
T. @ Portable Wall Hanger*

Based on training and experience, your Affiant believes that the use of the phrase “freedom loving red blooded folks” is an attempt to signal to the customer that Portable Wall Hanger is not an FBI sting but a business with a purpose of advancing the Boogaloo movement.

47. The account contains an e-mail received on or about March 15, 2020, from a customer who asked: “How many ‘keys’ does it roughly take before one breaks.” The user of the account replied:

All Portable Wall Hanger products are made from heat and impact resistant PETG so they're certainly pretty tough. We haven't performed testing to see how many times [sic] a set of keys can be hung on a Portable Wall Hanger before failure occurs, but I'm sure it would be a pretty high number!

48. The user of the account did not comment on the customer's use of quotations around the word "keys." Based on training and experience, your Affiant believes that, when the customer asked "How many 'keys' does it roughly take before one breaks," the customer is speaking in "code" because of the knowledge that drop in auto sears are illegal without the proper licensing and certifications. Your Affiant believes that the customer was asking, via "code language, how many rounds of ammunition can the drop in auto sear takes until it breaks. According to open source records, PETG is a thermoplastic polyester that provides significant chemical resistance, durability, and excellent formability for manufacturing, especially consumer and commercial applications that involve 3D printing.

49. The account contains an e-mail sent from a customer on April 25, 2020, stating: *"Cant [sic] wait to [sic] my care keys to go BRRRRRRR."* The user of the account did not respond to this statement from the customer. Based on training and experience, your Affiant believes that the "BRRRRRRR" reference above refers to the sound an automatic rifle makes when firing numerous rounds in a short amount of time.

50. The account contains additional "troubleshooting" e-mail communications similar to those between portablewallhanger@protonmail.com and the Minneapolis subject as mentioned above. Below are some examples:

- a. On or about March 9, 2020, one customer said: *"I'm having a problem mounting it into the lower part of my wall and I'm not sure if I'm doing it right because it's just not fitting the way I planed [sic]."* The user of the account directed the

customer to a “new installation animation video” on the website.

- b. On or about April 9, 2020, another customer said of the product: *“I have had to Modify it to work better with walls/shelf’s [sic] that are NOT low.”* The user of the account offered to send the customer a replacement or a different product. Based on training and experience, your Affiant believes that the reference to “walls/shelf’s that are not LOW” is a reference to different types of firearm receivers in the area of the firearm where the drop in auto sear is placed.
- c. On or about April 10, 2020, another customer said: *“First off, I’m not a fed or LEO. I know.. exactly what one would say. But I just got your wall hanger in the mail, but I can’t quite figure out how to ‘hang it on my wall’ so I can ‘grab my keys a lot quicker.’ Do you have any resources to show a customer how its [sic] used?”* The user of the account directed the customer to a “new installation animation video” on the website. The user of the account did not comment on the subject’s use of quotations around the phrases “hang it on my wall” or “grab my keys a lot quicker.” Based on training and experience, when the customer asks how to *“hang it on my wall’ so I can ‘grab my keys a lot quicker,’ ”* the customer is, in fact, asking through “code” language how to install the drop in auto sear so that he can fire rounds of ammunition quicker.

51. The account contains e-mails with photographs attached by the user of the account.

Below are descriptions of some of the e-mails:

- a. On or about February 15, 2020, the user of the account sent an e-mail to a customer. The e-mail had a .jpg file attached comprised of a photograph of an “Enhanced Portable Wall Hanger kit.” The properties of the .jpg file indicate that the

photograph was taken on or about February 13, 2020, with a Samsung Galaxy S9 SM-G960U cell phone.

- b. On or about April 11, 2020, the account received an e-mail from the account with one .jpg file attached depicting a “wall hanger.” The properties of the .jpg file indicate that the photograph was taken on or about April 11, 2020, with a Samsung Galaxy S9 SM-G960U cell phone.
- c. On or about April 15, 2020, the account received an e-mail from the account with three .jpg files attached depicting “wall hangers.” The properties of the .jpg files indicate that the photographs were taken on or about April 11 and 12, 2020, with a Samsung Galaxy S9 SM-G960U cell phone.

Based on the above referenced photographs and the device used to take the photographs, your Affiant believes that WATSON used a Samsung S9 mobile device to take the photographs.

Records for Portable Wall Hanger Instagram Account Include Communications Containing Veiled References to Boogaloo and Knowledge that “Hangers” are Drop In Auto Sears

52. On or about October 23, 2020, Facebook Inc. produced records for the Instagram account with username @Portable_Wall_Hanger pursuant to a search warrant issued in the U.S. District Court for the Northern District of West Virginia on or about October 22, 2020. The records include messages sent and received between January 2020 and October 2020, as well as media uploads during that period.

53. The Instagram account records contain messages between the Portable Wall Hanger user and users with usernames containing “boi” or “bois.” Based on training and experience, your Affiant knows that certain terms are associated with the Boogaloo ideology, specifically the use

of “boi” or “bios.” One of the usernames that communicated with the Portable_Wall_Hanger Instagram account is “Duncan Socrates Lemp,” an explicit reference to Duncan Lemp, previously mentioned above. At one point during this period, user “Duncan Socrates Lemp” made a comment that the Portable Wall Hanger products *“only work in armalite Walls.”* By way of background, ArmaLite is known to be an American small arms engineering company. Another username, “booglordinc,” sent a message expressing a hope that the Portable Wall Hanger Products are “sturdy” and made the following comment: *“I don’t mind seeing redcoats lying on the floor, but prefer to leave em properly hanging #twitchygurglythings.”* Based on training and experience, your Affiant believes the mention of “redcoat” is an anti-government reference as it refers to the British “Redcoats” during the American Revolutionary war.

54. Portable_Wall_Hanger Instagram account records contain a message posted by the Portable Wall Hanger user that included the following hashtag: “#wearduncan,” another reference to Duncan Lemp.

55. Portable_Wall_Hanger Instagram account records contain messages wherein the user of the account states that the Portable Wall Hanger products are “heat resistant.” For example, a message from a customer stating: *“I’ve heard other companies [sic] hangers only hold 5-6 sets of keys. I’m hoping these are stronger . . .”* The Portable Wall Hanger user responded: *“all Portable Wall Hanger products are constructed from heat resistant PETG. They’re certainly very tough.”* Based on training and experience, your Affiant believes that the above statements are using “code” language to speak to the strength and heat resistant qualities of a drop in auto sear.

56. Portable_Wall_Hanger Instagram account records contain a message wherein a customer asked if the Portable Wall Hanger products *“work on ‘low shelf’ walls as well as ‘high shelf.’”* Based on training and experience, your Affiant believes that the use of the terms “low

shelf” and “high shelf” are references to different types of firearm receivers in the area of the firearm where the drop in auto sear is placed.

57. Portable_Wall_Hanger Instagram account records contain a message wherein a customer asked if the Portable Wall Hanger products work on a “*ChekleZivocian scorpion wall*.” Based on training and experience, your Affiant believes that the mention of “scorpion” is a reference to a semi-automatic firearm manufactured by Česká zbrojovka Uherský Brod called “Scorpion.”

58. Portable_Wall_Hanger Instagram account records contain messages discussing whether Portable Wall Hanger is an FBI sting operation. Below are examples:

a. An individual sent the following message to the user of the account:

Hey @portable_wall_hanger I love the product, but I had a few questions for you. I was scrolling through your website when I noticed that the company your website belongs to, Perfect Privacy LLC, is foreign registered and basic info as to who owns the actual website has been restricted. Upon further digging, I happened to notice that the address to Perfect Privacy LLC is also 5335 gateway park Jacksonville Florida. That address is conveniently only 1300 feet from the FBI field office and within the same chain link fence compound. Isn't that peculiar? It's almost as if you boys are an FBI/ATF sting operation to catch people stupid enough to buy an obvious AR auto sear off a suspicious website with no privacy policy or additional merchandise other than this wall hanger.

b. Another individual responded in defense of Portable Wall Hanger:

[I]f you knew anything about amateur Web design (which you evidently don't) you'd know that it has all the hallmarks of an average, legitimate small business. Perfect privacy is used by small businesses pretty often. Usually fed operations are more polished and "professional" looking. But this isn't, this is all set up (with many of the common "mistakes") in the common ways that small businesses do things. But if you knew anything about Web design you'd know that. But you don't. You're just jumping on a bandwagon started by a couple of principle-less sticker salesmen who profit off of losing liberty and people being murdered. But then attack anybody who fights back in their own way.

c. This same individual also commented:

"I mean we're all on a watch list already anyhow so what's the harm."

- d. A third individual with Boogaloo term "boi" in the account username replied to the defensive individual and stated the following:

"ignorance is bliss until the pigs kill your dog" (another reference to the Duncan Lemp incident).

- e. The defensive individual responded with multiple Boogaloo references:

I mean you're a bunch of cucks who profit off boog memes by selling stickers and shit, profited off of Lemp's murder. You're all about "supporting" the boog when it makes you money. But as soon as somebody else actually stands up and does something in any form, you freak tf out and scream and cry "Extremist! Fed! Rheeeee."

59. Portable_Wall_Hanger Instagram account records contain a message from the Portable Wall Hanger user addressing web security following allegations that the company was an FBI sting:

Your assessment of our web design capabilities are spot on and slightly embarrassing lol. We of course set up the website with customer privacy in mind but it looks like some rookie mistakes will always happen 🙈 🛡️. As soon as we got grilled, I dug through every menu attached to weebly settings, for what it's worth there was (and is) no active tracking or pixils or any other option divulging or collecting info. We don't even have a mailing list. Since this whole slanderous mess we have made some great strides to improve the security and privacy of customer communication and are looking into different website options, it will just take a little time. Thank you again. Thank you for thinking for yourself and coming to the aid of a small business just trying to help. We won't forget that.

60. Portable_Wall_Hanger Instagram account records contain the following messages from an individual:

LOL I sent you an email yesterday that probably made no sense. I'm naturally paranoid but I'm just going to get to the point. So you put it in and you still only have two selections. If you want to go back to the original configuration you have to remove it right?

...

I used to be a cop so I had access to whatever tools I needed. I no longer subscribe to that ideology and I still feel good I should have the freedom to select the same tools necessary to protect my life because my life is just as important now as it was back then.

61. In response to this thinly veiled reference to using the Portable Wall Hanger products as drop in auto sears, the Portable Wall Hanger user stated:

Portable Wall Hanger Single Packs require no holes/drilling for installation, you just take the protective film off adhesive on the mounting base and stick to the wall. Coat Hanger Packs require 2 screws to be drilled into the walls for mounting which would consequently [sic] leave 2 holes behind if the entire Coat Hanger Pack is uninstalled. Outside of the above mentioned installation for the Coat Hanger Pack, there is no drilling required for installation of any Portable Wall Hanger products. We hope this info helps!

62. In response to a message asking where in West Virginia is Portable Wall Hanger located, the Portable Wall Hanger user stated: *"We're located in Ranson West Virginia."*

63. Portable_Wall_Hanger Instagram account records contain images uploaded by the Portable Wall Hanger user. These images include a photograph uploaded on or about April 16, 2020, sourced from "Android Library," of approximately two dozen boxes. The image is accompanied by the following message from the Portable Wall Hanger user:

*Good morning shout out to our new followers! We're working our asses off to get the website inventory replenished. **SATURDAY will be the day for restock! Getting ready to send this gaggle of Red Coat Hangers into the wild. All orders from Tue&Wed (14,15) are shipping out today!*

64. Portable_Wall_Hanger Instagram account records contain messages from the Portable Wall Hanger user claiming that the products are, in fact, only intended to be wall hangers. For example, one individual sent a message stating: *"It's obviously just a DIAS with a little extra material."* Based on training and experience, your Affiant knows that DIAS is an acronym for "drop in auto sear." The Portable Wall Hanger user replied: *"No it's not at all."* Similarly, the

same individual asked: “*Would the owner be alarmed to find out that his coat hangers could be modified to convert an AR-15 to a machine gun?*” The Portable Wall Hanger user replied: “*I don't understand the question. As I mentioned earlier, the Portable Wall Hanger makes Wall Hangers specifically designed to hang keys, lanyards, hats, jackets, coats and other small items.*” Finally, this same individual sent the following message to the Portable Wall Hanger user:

Let me break this down for you since I'm tired of tap dancing: I think you either glow or are too inept to get out of your own way. You took someone else's work and added a trinket to it to try and be cute about a gray area in the law. I don't care about the law in and of itself, but I think you're going to attract a lot of attention that no one needs. There are almost 9,000 people in det_disp right now who are able to keep a low profile and move things forward for 3D printing and gun rights. Playing “I'm not touching you” in order to make \$15 in sales per “key hanger” doesn't do anyone any favors. If you aren't a cop, you're a grifter. You message me and pretend you don't know what you're doing like I'm an idiot and expect me to remove my post advising people to consider steering clear of you. Unlikely. What you're doing isn't helpful for gun rights or for 3D printing.

65. The Portable Wall Hanger user responded as follows:

The tshirt/sticker salesman calling me a grifter 😏. I wish I could agree with at least one thing that you said, but as I said before and as I'll say again. My company provides home accessories and home furnishing products. We're literally called the Portable Wall Hanger for crying out loud. I completely denounce all slanderous accusations you have made about my business and products. I'm sorry that it doesn't [sic] appease you . . .

66. Based on training and experience, your Affiant believes that the above statements made by Instagram username Portable_Wall_Hanger is an attempt to keep a covert profile for the “business” and not to say anything that may indicate the individual’s underlying criminal intent to manufacture and sell drop in auto sears as wall/key hangers.

FBI-Pittsburgh UCE Purchases Auto Sears from Portable Wall Hanger

67. On or about October 15, 2020, a paid confidential human source (“CHS”) handled by FBI-Pittsburgh placed an order via the website portablewallhanger.com. Specifically, at the

FBI's request, the CHS ordered a "Portable Mask Hanger with a Replacement Hanger Hook" and a "Grey Coat Hanger Pack with a Replacement Hanger Hook" for a total of \$47.45, which the CHS paid via PayPal. The CHS requested that the order be shipped to a P.O. Box in Pittsburgh, Pennsylvania. The order confirmation page on the website indicated that the shipping method would be U.S. Postal Service 3-5 Business Days.

68. On or about October 19, 2020, the e-mail account provided by the CHS when placing the order received an e-mail from portablewallhanger@protonmail.com, stating:

*Hope you're well bud.
We're working on boxing orders right now. Your order is slated to ship today so you should be receiving a tracking number by the end of the day. (Keep an eye on your spam mail folder for, some reason the tracking # emails can wind up there for some customers.*

*Best Regards,
T. @ Portable Wall Hanger*

69. On or about October 19, 2020, according to the U.S. Postal Service, the subject package was dropped off at the U.S. Post Office in Ranson, West Virginia, for shipment to the P.O. Box in Pittsburgh. The Ranson post office is located approximately one (1) mile from WATSON's residence.

70. On or about October 20, 2020, an FBI surveillance team observed an individual believed to be WATSON exit WATSON's residence along with a female believed to be CROSS and get into a 2005 Volkswagen Jetta, hereinafter the "vehicle." The FBI surveillance team observed WATSON depart WATSON's residence area operating the vehicle. Registration records for the vehicle show WATSON as the owner/registrant of the vehicle since in or about October 2018. Registration records also associate the vehicle with WATSON's residence. The FBI surveillance team observed the vehicle arrive at the U.S. Post Office in Ranson, West Virginia.

FBI surveillance observed WATSON exit the vehicle with a small white package and enter the post office. Approximately three minutes later, FBI surveillance observed WATSON exit the post office and enter the vehicle. FBI surveillance observed the vehicle return to WATSON's residence where WATSON and CROSS then exited the vehicle and entered WATSON's residence.

71. On or about October 23, 2020, the aforementioned e-mail account provided by the CHS when placing the order received an e-mail from portablewallhanger@protonmail.com, stating that the order shipped out on October 19, 2020. The e-mail also included a U.S. Postal Service tracking number.

72. On or about October 24, 2020, the U.S. Postal Service delivered the package containing the Portable Wall Hanger products the CHS ordered on or about October 15, 2020, to the P.O. Box in Pittsburgh, Pennsylvania.

73. On or about October 26, 2020, the FBI obtained possession of the package, took photographs and inventory of the contents, and subsequently transferred custody of the package and contents to the ATF for inspection/analysis and testing. The package contained a Mask Hanger (vent clip and "hook"), a Coat Hanger (mounting bracket and "hook"), and four (4) replacement "hooks." The "hooks" are the pieces that operate as drop in auto sears. In total, six (6) "hooks" were purchased.

74. On or about October 27, 2020, the ATF analyzed the Portable Wall Hanger products ordered by the CHS and sent to Pittsburgh. The ATF determined that the "hooks" are, in fact, drop in auto sears.

Neither Watson nor Portable Wall Hanger is Registered to Manufacturer Firearms

75. On or about October 21, 2020, the ATF queried its database and discovered that neither Watson, queried by his name and social security number, nor Portable Wall Hanger is

registered to manufacture firearms.

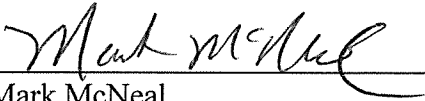
CONCLUSION

76. Based on the forgoing, there is probable cause that –
- a. Beginning on or about January 8, 2020, and continuing up to and including October 30, 2020, in Jefferson County, West Virginia, within the Northern District of West Virginia, and elsewhere, the defendant, **TIMOTHY JOHN WATSON**, did knowingly combine, conspire, confederate, agree and have a tacit understanding with another person to commit an offense against the United States, to wit: violations of 18 U.S.C. § 922(o) and 26 U.S.C. § 5861(a), and, in furtherance of the conspiracy, and to effect to objects thereof, a conspirator committed at least one overt act in the Northern District of West Virginia, in violation of 18 U.S.C. § 371.
 - b. Beginning on or about January 8, 2020, and continuing up to and including October 30, 2020, in Jefferson County, West Virginia, within the Northern District of West Virginia, the defendant, **TIMOTHY JOHN WATSON**, did knowingly possess and transfer machineguns, to wit: machinegun conversion devices for AR-15 style rifles, also known as “drop in auto sears,” in violation of 18 U.S.C. § 922(o).
 - c. Beginning on or about January 8, 2020, and continuing up to and including October 30, 2020, in Jefferson County, West Virginia, within the Northern District of West Virginia, the defendant, **TIMOTHY JOHN WATSON**, did knowingly engage in the business of manufacturing and dealing in firearms, to wit: machinegun conversion devices for AR-15 style rifles, also known as “drop in auto sears,” without having paid the special occupational tax required by 26 U.S.C. § 5801 and

without having registered as required by 26 U.S.C. § 5802, all in violation of 26 U.S.C. § 5861(a).


77. Accordingly, I request that the Court issue the proposed arrest warrant.

Respectfully submitted,



Mark McNeal
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on October 30, 2020



HONORABLE ROBERT W. TRUMBLE
UNITED STATES MAGISTRATE JUDGE